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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

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In the Matter of

Amendment of the Commission's Rules )	WT Docket No. 95-56
Concerning Low Power Radio and )	RM-7784
Automated Maritime Telecommunications )	
System Operations in the 216-217 MHz )	
Band )	DOCKET FILE COPY ORIGINAL

To the Commission:

**COMMENTS OF MULTIMEDIA WMAZ, INC.**

Multimedia WMAZ, Inc., licensee of Television Station WMAZ-TV, Macon, Georgia ["Multimedia"], by its attorneys, submits herewith its Comments in response to the Commission's *Notice of Proposed Rule Making* in the above-captioned proceeding.<sup>1/</sup>

The *Notice* proposes rules to permit the shared use of the 216 - 217 Mhz band by a new Low Power Radio Service, which would include law enforcement tracking systems, auditory assistance devices for the hearing impaired and health care assistance devices for disabled and ill persons. Such services would include, for example, a low power service (using 100 milliwatts or one tenth of a watt) to assist hearing-impaired individuals in halls, auditoriums and stadiums and for short range one-way (simplex) data transmission in hospitals. Another potential use involves very small transmitters to be inserted in goods which are likely to be stolen, to aid law enforcement efforts.<sup>2/</sup>

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<sup>1/</sup> *Amendment of the Commission's Rules Concerning Low Power Radio and Automated Maritime Telecommunications System Operations in the 216-217 MHz Band*, Notice of Proposed Rule Making, WT Docket No. 95-56, FCC 95-174 (May 16, 1995) ["Notice"].

<sup>2/</sup> The *Notice* was issued in response to proposals from Phonic Ear and PRONET, Inc.

The agency also proposes to allow Automated Maritime Telecommunications System ["AMTS"] coast stations to share this band on a secondary basis for point-to-point network control communications. This proposed service would involve operations using a maximum transmitter output power of 1 watt for network control of cellular telephone-type marine communications on coastal waterways.<sup>3/</sup>

The Commission proposes to authorize these uses on a secondary, non-interference basis to ensure that no harmful interference is caused to television stations which operate on Channel 13, and its proposed channel allocation is designed to minimize such interference.<sup>4/</sup> Notwithstanding the Commission's admirable objectives in this regard, Multimedia, as the licensee of a television station which operates on Channel 13, is concerned that additional regulatory requirements are necessary to ensure the continued integrity of existing, interference-free over-the-air television service.

**Proximity to Television Receivers.** PRONET claims that no interference to Channel 13 operations will be caused by low power transmitters so long as the transmitters remain at least three feet from television receivers. *Notice* at par. 4. To the extent this three-foot limit also applies to the type of operations proposed by Phonic Ear, the possibility for interference exists where transmitters are connected to a television receiver, whether in a hospital room or in a private home where a hearing-impaired person resides, within that

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3/ AMTS proposals were submitted by Waterway Communications Systems, Inc. ["Watercom"]; American Commercial Barge Lines ["ACBL"]; and SEA, Inc.

4/ Forty channels would be carved out of the 1 MHz band. The lower 20 channels closest to television channel 13 frequencies (210 - 216 MHz) would have a maximum power of 0.1 watt. The 1 watt service would utilize the top 20 channels which are furthest from Channel 13.

three-foot limit. Appropriate protections against that possibility should be included in any rules adopted as the result of this proceeding.

**AMTS Transmitters.** Watercom proposes a fixed point-to-point AMTS network control system. *Notice* at par. 5 A one watt transmitter like that proposed which is located on a 10-story building with a high gain transmitting antenna can generate a signal significantly strong to be of concern to Channel 13 licensees. If such a transmitter were to be located on a building with a television master antenna system, the AMTS signal could be received by the antenna system and cause direct interference to Channel 13 reception within the building. Transmitters to be used for this type of AMTS control service should not be permitted to co-locate with master antennas.

Multimedia suggests that any rules adopted herein require AMTS systems to use directional antennas so that the signal is radiated only toward the specific receivers in the system, rather than radiating an omni-directional signal. Multimedia also suggests that the Commission consider requiring (or at least encouraging) AMTS operators to co-locate 1 watt AMTS transmitters, to the extent feasible, at or near Channel 13 transmitter sites. Commission rules encourage such co-location in cases involving non-commercial FM and Channel 6 television operations, *see* 47 C.F.R. § 73.525, and similar considerations apply here.

Because of the possibility for interference, it is important that Channel 13 licensees be notified of the filing of applications for authorizations in the proposed new service. Multimedia urges the Commission to require applicants for use of these frequencies

to notify affected television licensees, in writing, of the filing of their applications.<sup>5/</sup>

Licensees should have 45 days in which to comment on those applications, as well as an opportunity to make actual field measurements once the transmitter is in operation but prior to final licensing. Such measurements would facilitate confirmation that actual operation conforms to theoretical system design.

Multimedia WMAZ, Inc. respectfully requests that if the Commission authorizes the services proposed in its *Notice*, it include in its enabling regulations the additional provisions discussed herein in order to ensure that the new services do not interfere with Channel 13 over-the-air television operations.

Respectfully submitted,

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<sup>5/</sup> The FCC requires notification to potentially affected licensees in other circumstances involving the potential for interference. *See, e.g.*, 47 C.F.R. § 73.525(b)(4); 47 C.F.R. § 80.475(a)(2).